

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ENTERPRISE FINANCIAL GROUP, INC.	§
	§
	§
<i>Plaintiff,</i>	§
	§
v.	§ CASE NO. Case 3:16-cv-03467-G
	§
INTEGRITY PROTECTION GROUP, LLC;	§
GREENLIGHT AUTO GROUP INC.; ADSERV	§
INC.; GREENLIGHT AUTO PROTECTION, LLC;	§
PROECO SOLUTIONS, INC.; OWEN A.	§
MCCOLLOUGH, an Individual; JOSEPH TYLER	§
WALSKI, an Individual; JASON RANDALL COX,	§
an Individual; DAVID GLENWINKEL, an Individual;	§
KRISTI CROWLEY, an Individual; and KEVIN	§
DEVOTO, an Individual	§
	§
<i>Defendants.</i>	§

RESPONSE TO ORDER TO SHOW CAUSE

I. INTRODUCTION

COMES NOW, Enterprise Financial Group, Inc., a Texas Corporation, and files this Plaintiff's Original Complaint against Defendants Integrity Protection Group, LLC; Greenlight Auto Protection, LLC, Greenlight Auto Group, Inc., Adserv, Inc., ProEco Solutions, Inc., Owen McCoullgh, Joseph Tyler Walski, Joseph Randall Cox, David Glenwinkel, Kristi Crowley and Kevin Devoto, and in support thereof, would show the Court the following:

II. RESPONSE TO ORDER TO SHOW CAUSE

1. This case should not be dismissed for lack of subject matter jurisdiction because jurisdiction exists pursuant to 28 U.S.C. §§ 1332. All Defendants hold citizenship outside of Texas and the amount in controversy exceeds \$75,000.00, excluding interest and costs. 28 U.S.C. §§ 1332(a). Counsel for Plaintiff regrettfully inadvertently omitted the aforementioned language. With

applogies to the Court, Plaintiff will file an Amended Complaint reflecting the change if this Honorable Court so allows. A true and correct copy of said Amended Complaint is attached hereto as Exhibit "A", and incorporated by reference herein.

Respectfully submitted,

SHIELDS LEGAL GROUP

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